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June 14, 2021

BY ELECTRONIC FILING

Hon. Michael A. Hammer, U.S.M.J.
Martin Luther King Bldg. & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: Garreffi v. Hicks, et al.
Case No: 2:20-cv-16396-MCA-MAH

Dear Judge Hammer:

Plaintiff filed an amended complaint in the above matter in accordance with the Court's Order [DE18]. On June 9, 2021 the State advised which of the new defendants were still employed and which were not. Plaintiff is advised that he may serve all defendants at the jail facilities where they currently work but for those no longer employed or on a leave of absence their last known addresses need to be provided. The Attorney General cannot accept service.

Accordingly plaintiff cannot meet the June 15, 2021 deadline for service/running of the Rule 4m period. Plaintiff requests permission to serve four of the new defendants – William Gallagher, Rashim Minatee, Willfredo Arroyo and Lt. Joseph Reardon, as well as former Warden Steven Johnson who can be served at DOC headquarters by June 30, 2021. The State shall provide the last known addresses of those employees no longer employed by the DOC – Verron Allen, James Lee and Christian Sanjuan by June 30, 2021 with service to be effectuated by August 15, 2021.

Lastly, and for the sake of completeness on the record, there is one defendant plaintiff named, James Murial, for whom the State has no record. By June 30, 2021 plaintiff will advise counsel of the record/information upon which plaintiff based the amended complaint with a response from the State by July 15, 2021 and service to be effectuated by August 15, 2021. All extensions run accordingly through August 15, 2021.

SHELLEY L. STANGLER, P.C.

Respectfully submitted,

A handwritten signature in blue ink, consisting of a stylized 'S' followed by a wavy line.

SHELLEY L. STANGLER, ESQ.

SLS/mf

cc: Chanell Marie Branch, DAG, via email: Chanell.Branch@law.njoag.gov